



1735 Market Street, 51st Floor
Philadelphia, PA 19103-7599
TEL 215.665.8500
FAX 215.864.8999
www.ballardspahr.com

Martin C. Bryce, Jr.
Tel: 215.864.8238
Fax: 215.864.8999
bryce@ballardspahr.com

December 22, 2015

Via ECF

Honorable Esther Salas
Martin Luther King Building, United States Courthouse
District of New Jersey
50 Walnut Street, Courtroom 5A
Newark, NJ 07101

Re: Jerry Wong v. Green Tree Servicing LLC, Case No.: 2:13-cv-7887-ES-JAD

Dear Judge Salas:

Pursuant to Local Rule 7.1(d)(5), we write to request a thirty day extension of time for Defendant Green Tree Servicing LLC ("Green Tree") to file its memorandum in opposition to Plaintiff Jerry Wong's Motion for Class Certification [ECF No. 38]. Green Tree's opposition papers are currently due by January 5, 2015.

The undersigned requests a thirty day extension of time in light of the upcoming holidays. I will be out of the office for the vast majority of time from December 23, 2015 to January 4, 2015. Moreover, my co-counsel and colleague at Ballard Spahr, Justin Angelo, will also be out of the office for most of that time and from January 11-12.

Opposing counsel has only agreed to grant Green Tree a seven day enlargement of time until January 12, 2015. This proposed extension only leaves Green Tree's counsel one week upon returning to the office to analyze the arguments that Plaintiff made in the thirty-seven page Motion, conduct the necessary research and prepare an opposition memorandum. Opposing counsel's refusal to grant a more reasonable extension is disappointing given Green Tree agreed on three occasions to Plaintiff's requests to extend the discovery deadline by at least thirty days [ECF Nos. 24, 30, 34]. Furthermore, while Plaintiff's counsel had six weeks to file his class certification motion [ECF No. 37], they seek to limit Green Tree to half as much time to prepare a response, 10 days of which the undersigned is out of the office.

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Accordingly, Green Tree respectfully requests a thirty day extension of time to file its response to the Motion and of the return date. This is Green Tree's first request for an extension as to the Motion, is made in good faith and not for the purposes of delay.

Respectfully yours

/s/ Martin C. Bryce.
Martin C. Bryce